

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 12-05296-BKT

EDNA M. LORENZO BONET

CHAPTER 7

DEBTOR

**APPLICATION FOR EMPLOYMENT OF REAL ESTATE BROKER
FOR THE ESTATE PURSUANT TO 11 USC § 327(a) and FRBP 2014**

COMES NOW Noemí Landrau Rivera, Chapter 7 Trustee duly appointed in the captioned case and before this Court most respectfully states and prays:

1. Debtor, Edna M. Lorenzo Bonet, filed a Chapter 7 petition for relief on July 03, 2012.
2. The bankruptcy estate in the captioned case includes real property subject to sale by Trustee as described in Schedules filed under penalty of perjury by the Debtor.
3. The undersigned Trustee seeks to employ, Pedro Betancourt Díaz, as real estate broker for the sale of real property of the bankruptcy estate. Mr. Betancourt Díaz does not hold any interest adverse to the bankruptcy estate. It is hereby disclosed Mr. Betancourt Díaz is a Chapter 7 Debtor with case number 13-03534 BKT and that undersigned Trustee served as his counsel while his case was in Chapter 13. Trustee, Noemí Landrau Rivera, does not represent Mr. Betancourt Díaz since her withdrawal as legal counsel as granted by the Court on September 9, 2013. Ms. Landrau Rivera did not and will not receive any compensation for legal services provided in connection to Mr. Betancourt Díaz' legal representation. Trustee and real estate broker have no other connection, other than the fact that Mr. Betancourt Díaz is real estate broker in other cases under undersigned Trustee's administration.
4. The employment of real estate broker is beneficial to the bankruptcy estate due to

Mr. Betancourt's experience and skill. Applicant believes, and therefore avers, that it is in the best interest of the estate that she be allowed to employ the abovementioned real estate broker for the purpose of marketing and completing the sale of real estate property of the bankruptcy estate.

5. With this application Trustee hereby submits Verified Statement and Curriculum Vitae of Pedro Betancourt Díaz, in compliance with the provisions of 11 U.S.C. §327, F.R.B.P. 2014 and LBR 2014-1. Mr. Pedro Betancourt Díaz will amend this statement immediately upon learning that: a) any of the representations made herein are incorrect, or b) there is any change in circumstance relating thereto.

6. Real estate broker has reviewed the provisions of LBR 2016-1 to ensure compliance with local rules.

7. To the best of Trustee's knowledge the professional whose employment is sought has no connection the debtors, Chapter 7 Trustee ,other than the one previously disclosed, the creditors, or any other party in interest and the U.S. Trustee's Office or any person employed by said office and his employment as counsel in this case will not harm or cause undue prejudice upon creditors, debtor, the bankruptcy estate and or any other party in interest. Real estate broker's engagement as realtor for the estate does not constitute or represent an adverse interest to the estate. Mr. Betancourt Díaz is therefore a disinterested person within the definition provided by 11 USC §101(14) and his employment is in the best interest of the estate.

8. That Mr. Pedro Betancourt Díaz is a disinterested person as that term is defined in 11 U.S.C. §101(14) and LBR 2014-1(a)(2) and b(1)(A) thru (E).

9. Services performed by broker will be equal to 5% of the gross sales price of the real property to be sold, subject to the filing of application for compensation and approval of the Bankruptcy Court pursuant to Local Bankruptcy Rules 2014-1 and 2016-1.

WHEREFORE , applicant prays that this Court grant this request and enter an order authorizing her to Pedro Betancourt Díaz, as real estate broker for the bankruptcy estate and Trustee for the purposes detailed in the application herein.

CERTIFICATE OF SERVICE: TRUSTEE HEREBY CERTIFIES that this motion has been filed thru the Bankruptcy Court's ECF/ECM electronic filing system which will automatically notify all participants to said system including the US Trustee at ustregion21.hr.ecf@usdoj.gov and counsel for Debtors. All other parties included in attached master address list who are not participants of the Court's automatic filing system shall be notified via regular mail, including Debtor at its address of record.

NOTICE TO ALL CREDITORS AND PARTIES IN INTEREST

Within twenty-one (21) days after service as evidenced by the certification, and an additional three(3) days pursuant to Federal Rules of Bankruptcy Procedure 9006(f) if you were served by mail, any interested party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by Law; (ii) the requested relief is against public policy; (iii) in the opinion of the Court, the interest of justice requires otherwise.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 7th day of February 2014.

/s/ Noemí Landrau Rivera
Chapter 7 Trustee
PO Box 270219 San Juan, PR 00927-0219
Tel. (787) 774-0224
Fax. (787) 793-1004
nlandrau@landraulaw.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

EDNA M. LORENZO BONET

DEBTOR(S)

CASE NO. 12-05296-BKT

CHAPTER 7

CERTIFICATE OF PROPOSED REAL ESTATE BROKER

I, Pedro Betancourt Díaz, real estate broker, do hereby certify under penalty of perjury that to the best of my knowledge, information and belief the following is true and correct:

1. I am a real estate broker authorized to exercise such profession by the laws of the Commonwealth of Puerto Rico, by the "Junta de Corredores, Vendedores y Empresas de Bienes Raíces" of the Commonwealth of Puerto Rico under license number 8416. The exercise of said licenses has in no way been restricted or limited.

2. I maintain offices at Calle Halcon 971, Urb. Country Club, Rio Piedras, PR 00924, with tel. (787) 547-6521.

3. I have agreed serve as real estate broker for the purpose of marketing and obtaining the closing of sales of real properties of the bankruptcy estate of the captioned case, as more particularly set forth in Trustee's application for appointment of real estate broker, subject to the approval of this Court.

4. To the best of our knowledge, I am a disinterested person, as defined in 11 U.S.C. §101 (14) and LBR 2014(a) and (b) since:

- a. I am not a creditor, equity security holder or insider;
- b. I am not an investment banker for any outstanding security of the debtor;
- c. I have not been, within three years before the date of the filing of the petition, an investment banker for the security of the debtor, or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the debtor;
- d. I am not and were not, within two years before the date of the filing of the petition a director, officer or employee of the debtor or of an investment banker specified in subparagraph (b) or (c) of this paragraph;
- e. I do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the debtor or an investment banker specified in subparagraph (b) or (c) of this paragraph, or for any other reason.

5. To the best of my knowledge, I do not have prior connections with the debtor, any creditor, or other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, except that I served have served as real estate broker for Chapter 7 Trustees serving in the panel of Chapter 7 Trustees. It is

hereby disclosed that I am also a Chapter 7 Debtor with case number 13-03534 BKT and Chapter 7 Trustee, Noemí Landrau Rivera, represented me as counsel while I was in Chapter 13. Ms. Landrau Rivera does not represent me since her withdrawal as legal counsel as granted by this Court on September 9, 2013. Ms. Landrau Rivera has not and will not receive any compensation for legal services provided in connection to her legal representation in my personal bankruptcy. Trustee and real estate broker have no other connection, other than the fact that Mr. Betancourt Díaz is real estate broker in other cases under undersigned Trustee's administration.

6. The source of the compensation promised to the undersigned shall be from such funds of the estate herein, as they may be available to Trustee.

7. Trustee has retained the undersigned as real estate broker in these proceedings subject to the approval of this Court in accordance to Rule 2014 of the Federal Rules of Bankruptcy Procedure, compensation to be received is 5% of the gross amount of the sales price, upon application(s) and the approval of the Court.

8. There are no agreements on the part of the undersigned for the sharing of any compensation of reimbursement received or to be received under 11 U.S.C. §§330(a) and 503(b)(2), or otherwise in connection with this case, nor will it share in any such compensation or reimbursement received by another person under such sections.

9. I will amend this statement immediately upon my learning that" (a) any of the representations made herein are incorrect, or (b) there is any change of circumstances relating thereto.

10. I have reviewed the provisions of LBR 2016-1.

In San Juan, Puerto Rico this 7TH day of February 2014.

/s/ Pedro Betancourt Díaz
Lic. No. 8416
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Pedro Betancourt Díaz

Experience	1999–2001	Eagle Realty	Carolina, PR
	Real Estate Broker		
	Since 2001	BC Properties	Carolina, PR
	President		

Education

Instituto de Banca y Comercio 1994
Restaurant administration

San Juan Board of Realtors 1998
Real Estate Broker Course (Lic. 8416)

Related education

Instituto Prof. José R. Faria 2000
Regulations 10 Law Course
Ethics Regulations Course

San Juan Board of Realtors
Documentation for closing and legal aspects Course

San Juan Board of Realtors 2002
Valuation Analysis Course

Instituto Prof. José R. Faria 2003
Mathematics for Real Estates Course
Sales Techniques Course
Mortgage Financing Course

San Juan Board of Realtors
Financing of commercial properties Course

San Juan Board of Realtors 2004
Legal Aspects Course
Mortgage Financing Course
Venta de Propiedades Bajo Ley de Quiebra Course

San Juan Board of Realtors 2005
Ventas de Propiedades Reposeidas Course

Instituto de Realtors de Puerto Rico 2006
New apartment valuation and valuation analysis Course

San Juan Board of Realtors
Sales Techniques Course

Instituto de Realtors de Puerto Rico 2007
Regulations 10 Law Course
Venta de Propiedades Fuera de Puerto Rico Course
Mathematics for Real Estates Course

Asociación de Realtors
Computers Techniques for Real Estates Course

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Case 12-05296-BKT7
District of Puerto Rico
Old San Juan
Mon Feb 10 12:24:57 AST 2014

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NOEMI LANDRAU RIVERA
CHAPTER 7 TRUSTEE
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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PO BOX 191017
SAN JUAN, PR 00919

(d)ORIENTAL BANK
ANGEL M VAZQUEZ BAUZA
PO BOX 191017
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